



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

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28 AUG 1988

MEMORANDUM

SUBJECT: Proposed Remedial Action Plan for Ordot Landfill, Guam  
FROM: Kent Kitchingman, Chief  
Quality Assurance Management Section (P-3-2)  
TO: Rick Sugarek  
Federal Response Section (T-4-3)

We have reviewed the PRAP for Ordot, and we have some concerns about the initial site investigation (ISC) and the recommendations for further monitoring work. The report indicates that no drinking water MCLs were exceeded in groundwater; however, the quantitation limit for vinyl chloride was not low enough to determine if the 2.0 ppb MCL was exceeded. Would the presence of vinyl chloride at or above the MCL, but below the CLP detection limit, change the conclusions reached in this report?

The PRAP also acknowledges that the scope of the ICS was limited and that further monitoring should be conducted by Guam. We agree with this recommendation. However, no mention is made of further investigating the geology of the site. Was the geological data collected for the ISC sufficient to conclude that no aquifer (i.e., a limestone formation) exists below the site and that there is no hydrologic connection between the site and the aquifer to the north? Should further geological studies be recommended along with continued monitoring to confirm these conclusions?

Finally, we recommended that if Guam EPA will be conducting further analyses of samples from around the site, their laboratory should participate in the volatile portion of EPA's Water Supply and/or Water Pollution Laboratory Performance Evaluation Studies. Currently, Guam EPA participates in these studies only for inorganics and some extractable organic analyses.

Please call me at x-0924 if you have any questions.